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1	KRONENBERGER ROSENFELD, LLP	
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8	Attorneys for Third-Party Defendant Ryan Lenahan and for Specially Appearing Third-Party Defendant Kyle Danna	
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11	UNITED STATES DISTRICT COURT	
12	NORTHERN DISTRI	ICT OF CALIFORNIA
13	DAVID TRINDARE individually and an	Case No. 5:12-cv-04759 (PSG)
14	DAVID TRINDADE , individually and on behalf of all others similarly situated,	
15	Plaintiff,	DECLARATION OF JEFFREY M. ROSENFELD IN SUPPORT OF THIRD-PARTY DEFENDANT RYAN LENAHAN'S MOTION TO STRIKE CLAIMS UNDER CAL. CODE OF CIV. PROC. 425.16 (ANTI-SLAPP
16	V.	
17	REACH MEDIA GROUP, LLC, a Delaware limited liability company,	
18		
19	Defendant,	MOTION)
20	REACH MEDIA GROUP, LLC, a	DATE: February 26, 2013
21	Delaware limited liability company,	TIME: 10:00 a.m. CTRM: 5, 4 th Floor JUDGE: The Hon. Paul S. Grewal
22	Third-Party Plaintiff,	
23	V.	
24	RYAN LENAHAN, an individual, KYLE	
25	DANNA, an individual, and EAGLE WEB	
26	ASSETS INC., a corporation,	

Case No. 5:12-cv-04759 (PSG)

Third-Party Defendants.

ROSENFELD DECL ISO MTN TO STRIKE (ANTI-SLAPP)

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I, Jeffrey M. Rosenfeld, declare as follows:

- I am an attorney admitted to practice in the State of California and before 1. this Court. I am a partner at the law firm of Kronenberger Rosenfeld, LLP, counsel of record for Third-Party Defendants Ryan Lenahan and Kyle Danna. Unless otherwise stated, I have personal knowledge of the matters stated herein.
- 2. Facebook is a social networking website, which allows users to form groups. Access to Facebook groups can be limited to members of the group or can be open to any user of Facebook.
- 3. On January 16 and January 18, 2013 I visited the Facebook group named, "Internet Advertising—People Who Don't Pay," located and <www.facebook.com/groups/internetdeadbeats> (the "Facebook Group"). I accessed the Facebook Group using Kronenberger Rosenfeld, LLP's Facebook account.
- 4. I was able to access the Facebook Group and view the materials posted on the Facebook Group without becoming a member of the Facebook Group.
- 5. The materials posted on the Facebook Group included but were not limited to: a) hundreds—if not thousands—of comments posted to the Facebook Group, b) a list of the 2,244 members of the Facebook Group and links to their Facebook profiles, and c) an "About" section describing the Facebook Group.
- 6. Attached hereto as Exhibit A is a true and correct printout of a screenshot of the "About" section of the Facebook Group, which reflects that the Facebook Group has 2,244 members. I downloaded this screenshot on January 16, 2013 from the Facebook Group using the Google Screen Capture extension in connection with the Google Chrome web browser.
- 7. Attached hereto as Exhibit B is a true and correct printout of a screenshot of the portion of the Facebook Page that displays the statements at issue in the lawsuit, and the comments provided by others in response. I downloaded this screenshot on January 18, 2013 from the Facebook Group using the Google Screen Capture extension in connection with the Google Chrome web browser.

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Case No. 5:12-cv-04759 (PSG)

ROSENFELD DECL ISO MTN TO STRIKE (ANTI-SLAPP)

KRONENBERGER ROSENFELD 150 Post Street, Suite 520, San Francisco, CA 94108

8. The website located at <www.compete.com> provides estimates of the amount of Internet traffic a website experiences per month. On January 16, 2013, I visited the website located at <www.compete.com> and ran a query on the website <www.shoemoney.com>. Attached hereto as Exhibit C is a true and correct printout of a screenshot from the results page after running my query on the Compete.com website. As Exhibit C shows, Compete.com estimates that during the past several months, the website located at <www.shoemoney.com> has experienced about 10,000 to 35,000 visitors per month.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that this Declaration was executed on January 18, 2013.

S/Jeffrey M. Rosenfeld

Jeffrey M. Rosenfeld

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